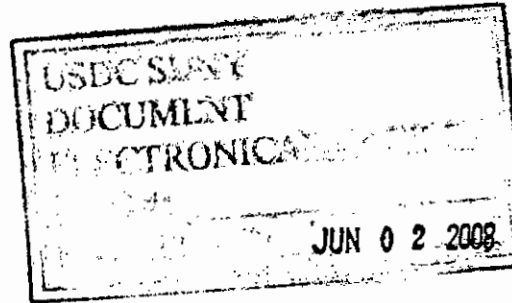




**FOLEY
HOAG LLP**
ATTORNEYS AT LAW

May 30, 2008



Janis H. Brennan
Washington, DC Office
202.261.7315
jhbrennan@foleyhoag.com

Via Fax: (212) 805-0426

Honorable Laura Taylor Swain
United States District Court
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *E.T.I. Euro Telecom International N.V. v. Republic of Bolivia and
Empresa Nacional de Telecomunicaciones Entel S.A.*, Civil Action No.
08-CV-4247 (LTS/FM)

Dear Judge Swain:

On behalf of Defendant Republic of Bolivia ("Bolivia"), we respectfully request permission to submit a Memorandum of Law in Opposition to Plaintiff's Motion to Confirm the *Ex Parte* Order of Attachment issued by the Court on May 5, 2008, of up to 35 pages in length, instead of the 25-page limit provided in Your Honor's Individual Practice Rule 2(H). We have conferred with counsel for Plaintiff on whether they consent to this request, and they have authorized us to represent that they take no position on it. Counsel for Defendant Empresa Nacional de Telecomunicaciones Entel S.A. ("Entel") consents to this request.

Pursuant to a Stipulation filed with the Court on May 29, 2008, the parties have agreed that each Defendant would file its Opposition to Plaintiff's Motion to Confirm the *Ex Parte* Order of Attachment on June 3, 2008. The Stipulation is currently pending before Your Honor.

On May 5, 2008, this Court ordered the *ex parte* attachment of Entel's funds located in certain New York banks, in aid of an international arbitration filed by Plaintiff, a wholly-owned Netherlands subsidiary of an Italian telecommunications company, before the International Centre for the Settlement of Investment Disputes (ICSID) in October 2007. In Plaintiff's Request for Arbitration, it claims that Bolivia breached the Netherlands-Bolivia Bilateral Investment Treaty.

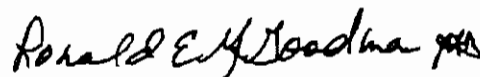
D108248.2

Honorable Laura Taylor Swain
May 30, 2008
Page 2

Bolivia's Opposition to Plaintiff's Motion to Confirm the *Ex Parte* Order of Attachment will address several arguments related to the immunities afforded to the Defendants and the attached property pursuant to the Foreign Sovereign Immunities Act ("FSIA"), 28 U.S.C. §§ 1602, *et seq.* In addition, Bolivia will address the Convention on the Settlement of Investment Disputes between States and Nationals of Other States (the "ICSID Convention"), 17 UST. 1270, 575 UNTS 159, and the enforcement provision for awards rendered pursuant to the ICSID Convention, codified at 22 U.S.C. §1650a. Bolivia's Opposition will also address issues related to the UN Convention for the Recognition and Enforcement of Arbitral Awards (the "New York Convention").

In order to adequately address these and other issues raised by Plaintiff in its Motion to Confirm the *Ex Parte* Order of Attachment, Bolivia believes that a Memorandum in excess of 25 pages is required, particularly given the number of issues raised in this matter and their importance to the immunity of the property of a foreign state under the FSIA. Consequently, we request that the Court grant Bolivia leave to file a Memorandum of Law of up to 35 pages in Opposition to Plaintiff's Motion to Confirm the *Ex Parte* Order of Attachment.

Respectfully submitted,



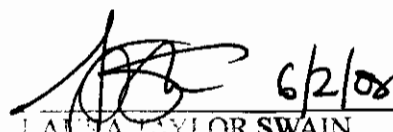
Ronald E.M. Goodman (RG 6698)

cc: Robert L. Sills
Steven J. Fink
Orrick, Herrington & Sutcliffe LLP
Counsel for Plaintiff
Facsimile: (212) 506-5151

Michael Krinsky
Rabinowitz, Boudin, Standard, Krinsky
& Lieberman, P.C.
Counsel for Defendant Empresa Nacional
de Telecomunicaciones Entel S.A.
Facimile: (212) 674-4614

Request granted.

SO ORDERED.


6/2/08
LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE